

*AUSA Assigned: PC*

*County: Spokane*

*Re: Complaint and Arrest Warrant for Bryon TELLIER and Jazzlynn JOHNSON  
Case No.: 2:20-MJ-000138-JTR*

FILED IN THE  
U.S. DISTRICT COURT  
EASTERN DISTRICT OF WASHINGTON

**AFFIDAVIT**

STATE OF WASHINGTON )  
                        )  
                        ) ss  
County of Spokane     )

**Apr 08, 2020**

SEAN F. MCVOY, CLERK

**AFFIDAVIT IN SUPPORT OF PROBABLE CAUSE**

I, Russell Pablo, Special Agent, Spokane Resident Office, United States Secret Service, (hereinafter USSS), being duly sworn, hereby depose and state:

**INTRODUCTION AND AGENT BACKGROUND**

1. I am a Special Agent with the USSS and have been so employed since January 2019. I earned a Bachelor of Arts degree in Global Studies/International Relations from the University of Washington, and a Master of Arts degree in Homeland Security and Emergency Management from Arizona State University. Prior to my employment with the USSS, I was an active duty member of the United States Air Force for nearly eight (8) years, where I attended numerous specialized training courses, and earned several decorations. In January 2019, I attended the Criminal Investigator Training Program at the Federal Law Enforcement Training Center (FLETC). This training covered the investigation of violations of federal laws, the

process of criminal investigations, and the judicial process. Following FLETC, I attended the Secret Service training academy in Beltsville, MD. This training focused specifically on violations of federal laws which the Secret Service investigates; to include bank fraud, access device fraud, wire fraud, crimes relating to counterfeit currency (CFT), and cybercrimes. During my training at the Secret Service Academy, I was instructed in how counterfeit currency, counterfeit credit cards, and counterfeit checks are manufactured, to include the use of computers and electronic media in the manufacturing process, and the use of various chemical agents to bleach or wash the ink off genuine Federal Reserve Notes (FRNs) in order for higher denominations to be reprinted on the genuine FRN paper. I was also trained in how to detect counterfeit currency and trained on the special security features present in genuine FRNs.

Routine duties of your Affiant include the investigation of violations of federal laws pertaining to financial crimes against the United States, to include the counterfeiting of FRNs, credit cards and commercial checks. During my investigative career, I have encountered cases where electronic media, to include computers, printers, cell phones and media storage devices (CD's, thumb-drives, flash drives, external hard drives, etc.) have been used to violate the law by manufacturing counterfeit currency, commercial checks, and false identification or storing of those images for future use. As part of my duties, I investigate violations of federal law, including the manufacture and passing of counterfeit currency and fictitious obligations, particularly in relation to violations of Title 18, United States Code, Sections 471, 472, 473, 513, 514, and 1344.

2. I am the case agent in this investigation. In addition to developing knowledge of facts through my personal investigation, I have spoken to agents and local Police Officers/Sheriff's Deputies, involved in this case, and know the following to be true and correct.

3. This affidavit only contains those facts and circumstances necessary to establish probable cause and does not include each and every fact known to me concerning this investigation. I have set forth only those facts that I believe are necessary to establish probable cause.

#### **FACTS RELATING TO PROBABLE CAUSE**

4. On April 7, 2020, I was contacted via phone by Deputy (Dep) James Hall of the Spokane County Sheriff's Office (SCSO). Dep. Hall informed me that he had two (2) individuals in custody for passing a counterfeit (CFT) \$100 federal reserve note (FRN) at Rite-Aid, located at: 12222 E Sprague Ave, Spokane Valley, Washington 99206, within the Eastern District of Washington. Dep. Hall further advised that the 2 individuals were identified as Bryon TELLIER and Jazzlynn JOHNSON. I informed Dep. Hall that I would respond to the scene and conduct a field interview (FI) of both TELLIER and JOHNSON. Dep. Hall informed me that he along with other SCSO Deputies were standing by at the Indy Food Mart, located at: 115 S. Pines Rd, Spokane Valley, Washington 99206, and that both TELLIER and JOHNSON were secured in separate SCSO patrol vehicles at the location. These 2 subjects had previously come to the attention of the SCSO and the USSS, when they were arrested by the SCSO on March 29, 2020 in relation to use of fraudulent credit cards, possession of counterfeit (CFT) currency, and

manufacturing of CFT currency. Pursuant to that arrest, JOHNSON and TELLIER were released on their own recognizance after their initial appearances.

5. I responded to the Indy Food Mart, and made contact with the SCSO Deputies that were at the scene. Dep. Vucinch informed me that there was Rite-Aid video surveillance of JOHNSON and TELLIER passing a CFT \$100 FRN. Dep. Vucinch advised me that during his review of the video surveillance, it can be clearly seen that JOHNSON and TELLIER approach the cashier and JOHNSON removed the CFT FRN from her purse and handed it to TELLIER to give to the cashier at Rite-Aid. Dep. Vucinch later retrieved copies of the video surveillance, he retained one (1) copy for the SCSO and he provided me with the other copy.

6. I have had the opportunity to observe the CFT \$100 FRN passed by JOHNSON and TELLIER. Based upon my training and experience, the CFT FRN exhibit characteristics consistent with CFT FRN, to include poor image quality, lack of red and blue security fibers, incorrect ink structure, lack of security thread, and an under-defined watermark.

7. I asked Dep. Hall if both JOHNSON and TELLIER had been read their *Miranda* warnings. Dep. Hall stated that they both had been read their *Miranda* warnings and subsequently waived those rights, and agreed to speak with SCSO Deputies. Dep. Hall advised that JOHNSON told him she did not know the FRN was CFT. Dep. Hall also advised me that the SCSO found methamphetamines on TELLIER's person during a Search Incident to Arrest (SIA).

8. When I arrived on scene I observed that JOHNSON and TELLIER were secured in separate SCSO patrol vehicles. I contacted JOHNSON first, and after identifying myself, I read her *Miranda* warnings using an app on my issued USSS issued iPhone. She stated that she

understood her rights, and agreed to speak with me. I asked JOHNSON to explain to me where the CFT FRN came from, she stated to me that “Bryon” was the one that had provided her with the CFT FRN. She further explained during the FI, that she had 2 additional CFT FRNs, both \$100 in denomination in her possession that were inside of a book in her purse. At the very moment she was explaining that to me that she had the 2 additional CFT FRNs, the SCSO Deputy conducting and inventory of her purse located the 2 CFT FRNs. JOHNSON again stated that she had received the CFT FRNs from TELLIER. JOHNSON continued to state that her six (6) year old son, younger sister, and father (who is also of record with the SCSO and USSS based on the arrest on March 29, 2020) were waiting for them at the hotel they were staying at. JOHNSON continued and stated that they were staying at the HomeTowne Studios hotel, which was determined to be located at: 12803 E. Sprague Ave, Spokane Valley, WA, 99206. I asked JOHNSON how they had paid for the room at the HomeTowne Studios, and she stated that “Bryon” had paid for the rooms. JOHNSON told me that they were staying in rooms 303 and 308.

9. I made contact with TELLIER, whom was secured in a different SCSO patrol car. I read him his *Miranda* warnings using the app on my issued USSS iPhone. TELLIER stated that he understood his rights and agreed to speak with me. TELLIER explained to me that the CFT FRNs were provided to him by JOHNSON, and that after they had been arrested and subsequently released, JOHNSON was able to obtain various item used for manufacturing CFT currency, including a printer and ink. I asked TELLIER where they had been residing in the Spokane since their release from the earlier arrest, and he stated that they have been staying at the HomeTowne Studios hotel. I asked TELLIER to verify what rooms they were staying in and

he told me rooms 303 and 308. I asked TELLIER if they had been manufacturing CFT currency in those rooms, and he stated that JOHNSON was manufacturing CFT currency in both rooms where they were staying at the hotel, utilizing a printer and her phone. I asked TELLIER if anyone else was in the room, and he stated that Stephen JOHNSON, Jazzlynn's father was staying in room 308.

10. At the conclusion of the FI, JOHNSON and TELLIER were transported and booked into the Spokane County Jail on charges of forgery, and possession of methamphetamines.

11. Continuing on the same date, along with Deputies from the SCSO, I went to the HomeTowne Studio hotel, and made contact with the manager, identified as Gary Sawyer. I asked Sawyer if anyone was staying in rooms 303 and 308. Sawyer stated to me that he remembered a "young guy" by the name of "Bryon" that had been staying in room 303, but that he had checked out. Sawyer also stated to me that he remembered TELLIER paying for 2 rooms at the hotel. Sawyer checked his internal system and verified that indeed TELLIER had paid for both rooms 303 and 308. Sawyer was able to provide me with the transaction record, and stated that TELLIER had checked out of room 303, but that "his father" was still staying in room 308. Sawyer further stated that room 303 had not been cleaned yet, and allowed us to search room 303. Nothing of evidentiary value was located in room 303. I informed Sawyer that we had reason to believe that an ongoing criminal enterprise being conducted in room 308. Sawyer stated that he would be evicting any individuals located in room 308.

## **CONCLUSION**

12. Based on the aforementioned factual information, your Affiant respectfully submits that this Affidavit supports probable cause for the Complaint charging 18 USC §§ 472, 2, Uttering a Counterfeit Obligation or Security.

Respectfully submitted,



Russell Pablo, Special Agent  
United States Secret Service

Sworn electronically and signed electronically

~~SUBSCRIBED AND SWORN to before me on this~~ 8th day of April, 2020.



John T. Rodgers  
United States Magistrate Judge

